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22 September 2005

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ANNUAL MONITORING REPORT – SACRAMENTO VALLEY WATER QUALITY COALITION

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed the Annual Monitoring Report (Annual Report) for the Sacramento Valley Water Quality Coalition (Coalition), which was submitted on 1 April 2005. This Annual Report was submitted by the Coalition to meet the conditions of the Monitoring and Reporting Program (MRP) Order No. R5-2003-0826 for Coalitions under Resolution No. R5-2003-0105.

The Water Board would like to acknowledge the fact that the Coalition did conduct timely submittal of the Annual Report and recognizes the work involved. We are confident that additional improvements in communications, in report format, specifications as listed in the attached staff review, as well as improvements in collaboration will help protect water quality and ensure success for the Coalition approach being utilized in the Irrigated Lands Conditional Waiver Program.

The attached staff review memorandum includes comments, suggestions and clarifications of requirements that are part of the MRP, many of which have already been provided to the Coalition in communications with Water Board staff. In order to more fully comply with the required specifications for the Annual Report, the Coalition will need to submit the following to the Water board office by **1 November 2005**:

- A signed transmittal letter for the Coalition Annual Report, which should have been submitted on 1 April 2005, as described in the attached staff review memorandum.
- Complete and unique sample site location identification as well as site descriptions, GPS coordinates, land and chemical use. This basic information needs to be provided for all monitoring sites referred to in the Annual Report, whether they are compliance sites, supplemental sites, or other sites.
- Sample site and land use maps that provide accuracy for sample site locations and land use designations.

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- Chain of Custody documentation that was missing from the Annual Report including those for sampling that occurred at compliance sites McGaugh Slough (001-MGSLU-039), Rough and Ready Pumping (001-RARPP-069), Coon Creek (001-CCSTR-76), and at all of the Supplemental Sites.
- Field logs, laboratory data sheets, calibration information and raw data sheets for all Supplemental Sites that are included in the Annual Report.
- Data that was missing from the Annual Report, including quality control results as described in the attached staff memorandum, and flow measurements for all compliance monitoring sites.
- If complete quality control information cannot be provided, the Coalition will need to submit a corrective action report describing the steps the Coalition will take in the future to ensure that all quality control information is provided for all monitoring data, as well as steps that the Coalition will take when quality control criteria are not met. This includes frequency of field and laboratory quality control samples, as well as precision and accuracy criteria.

Coalition Group MRP Order No. R5-2003-0826 specifies that *“If results indicate that water quality objectives are exceeded at any site, monitoring for the constituents of concern shall continue and the monitoring must be expanded upstream in a systematic search for sources.”* The Revision to the Coalition Group MRP, Order No. R5-2005-0833, further elaborates that when an exceedance occurs, the Coalition must conduct and report on *“follow-up monitoring and analyses that were conducted, what actions were taken to identify the source of the problem, complete analytical laboratory results...”* In fact, Water Board staff did remind the Coalition of this expectation to resample on 16 May 2005. On that date, the Coalition was instructed by staff to resample at the Burch Creek monitoring site following a sampling event that indicated aglae toxicity. This resample did not occur, and instead the Coalition mailed a letter on 24 May 2005 stating that new samples would not be collected because of a significant delays. This lack of response to direction from Water Board staff implies that the need to conduct follow-up monitoring and to respond to Water Board direction is not taken seriously by the Coalition. In the future, the Coalition will need to conduct resampling, or promptly discuss with staff the alternatives to resampling and follow-up activities that will adequately address the water quality exceedance. This will be necessary in order to remain in compliance with the Irrigated Lands Conditional Waiver.

In order to ensure compliance with the new Monitoring and Reporting Program, Order Number No. R5-2005-0833, the Coalition will need to incorporate the following for existing and future monitoring efforts and include the documentation in the next Semi-Annual Monitoring Report.

- Monitoring for 303(d) listed contaminants as well as sediment toxicity during irrigation and dormant season, as described in Order No. R5-2005-0833.
- Exceedance reports shall be submitted according to the time schedule prescribed in Order No. R5-2005-0833 for exceedances of all water quality parameters, including pH, DO, coliform, pesticides and other parameters that have associated Basin Plan objectives.
- Communications to the Water Board regarding follow-up to any exceedances that include actions taken to address the exceedances, as described in Order No. R5-2005-0833.
- Tabulation of all monitoring results, to include supplemental sites, and comparison with Basin Plan and water quality objectives and a discussion of the results in the report narrative.

- Quality control samples must be collected at the appropriate frequency and all results must be evaluated and submitted in the next semi-annual monitoring report.
- When quality control criteria is not met, either because of Coalition error or laboratory error, corrective action and resampling must occur in order to provide monitoring data that is required.
- Appropriate follow-up for toxicity test dilutions series as well as Toxicity Identification Analyses must be conducted as described in Order No. R5-2005-0833 and in the attached staff review memorandum.

Some of the Supplemental Monitoring Sites exhibited significant toxicity, as well as exceedances in other water quality parameters. These sites are identified in the attached staff review memorandum as Cache Creek, Ridge Cut, Putah Creek, Fall River, Pitt River, Coon Creek, Big Indian Creek, Indian Creek, Spanish Creek, YBWS and Willow Slough. Both Order No. R5-2003-0826 and Order No. R5-2003-0833 specify that *"If results indicate that water quality objectives are exceeded at any site, monitoring for the COCs shall continue and the monitoring must be expanded upstream in a systematic search for sources."* Therefore, it is recommended that the Coalition continue to monitor at these locations, and to submit a revision to the MRP Plan by **1 November 2005** that identifies appropriate action to identify the source of the exceedances and must consider appropriate action to effectively control the cause of waste discharge and protect water quality.

The attached staff review memorandum also identifies three compliance monitoring sites as high priority and is requiring that the Coalition submit a revision to the MRP Plan by **1 November 2005** to include repeat and upstream monitoring at these sites, or other approaches to firmly identify and control the sources of toxicity. These sites are identified as Burch Creek at Woodson Bridge Ave, Pine Creek at Nord-Gianella Road, and Z Drain-Dixon RCD.

If you have any questions or comments, please contact Taro Murano at 916-464-4846 or tmurano@waterboards.ca.gov.

Original Signed By:

MARGIE LOPEZ READ
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Enclosure: Staff Review of Annual Monitoring Report